

BERRY APPLEMAN & LEIDEN

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Attorney for Plaintiff

Student Doe #1

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Student DOE #1

Plaintiff,

v.

Donald J. TRUMP, in his official
capacity, President of the United
States of America;

John TSOUKARIS, in his official capacity
as ICE Enforcement and Removal
Operations New Jersey Field Office
Director;

Todd M. LYONS, in his official capacity,
Acting Director, Immigration and
Customs Enforcement, U.S. Department
of Homeland Security; and

Kristi NOEM, in her official capacity,
Secretary, U.S. Department of Homeland
Security;

Defendants.

Case No. 2:25-cv-02825-MCA-LDW

PROPOSED BRIEFING SCHEDULE

Pursuant to this Court's text order (ECF 6), parties have conferred and propose the
briefing and argument schedule below.

Defendants have requested until Friday, April 25th to respond the Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction.

Given the Easter Holiday, Plaintiffs are amenable to this briefing schedule with a stipulation that the Defendants will take no enforcement action including arresting, initiating removal proceedings, detaining, transferring, or deporting the Plaintiff until this Court is able to resolve and rule on the Motion for the Temporary Restraining Order.

Assistant United States Attorney, Angela Juneau, is consulting with the Defendants to get their position on this stipulation, however, she has been unable to reach the Defendants to get the stipulation by the Court imposed deadline of close of business today.

Therefore, Plaintiffs request that this Court issue a temporary emergency injunctive order prohibiting the Defendants from taking any of the enforcement actions mentioned above until the Court is able to resolve the Temporary Restraining Order. This temporary emergency injunctive order would expire when the Court rules on the Motion for Temporary Restraining Order.

Defendants do not agree to the temporary emergency order.

Dated: April 18, 2025

Respectfully submitted,
/s/ Jeff Joseph
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